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ATTORNEYS FOR DEBTOR SUPERIOR AIR PARTS, INC.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

SUPERIOR AIR PARTS, INC.,

Debtor.

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Case No. 08-36705

Chapter 11

**DEBTOR'S UNOPPOSED MOTION TO SHORTEN NOTICE,
SET DEADLINES AND EXPEDITE HEARING DATE ON
APPROVAL OF DEBTOR'S DISCLOSURE STATEMENT**

AN EXPEDITED HEARING HAS BEEN REQUESTED.

Superior Air Parts, Inc. ("Superior" or "Debtor"), hereby files this Motion to Shorten Notice, Set Deadlines and Expedite Hearing Date on Approval of Debtor's Disclosure Statement (the "Motion") and would show the Court as follows:

1. On May 15, 2009, the Debtor filed its Plan of Reorganization ("Plan") and Disclosure Statement. The Plan and Disclosure Statement were served on all parties entitled to notice pursuant to Bankruptcy Rule 2002(b) at that time.

2. The Court has recently set the hearing to approve the Disclosure Statement for July 21, 2009. Notice of the hearing has not yet been served because the Debtor has been in negotiations with the various constituencies regarding modification to the Disclosure Statement, bidding procedures and a consensual joint plan with the Committee.

3. Pursuant to Bankruptcy Rule 2002(b), creditors and all parties-in-interest are entitled to 25 days' notice of the deadline for objections and the hearing date to consider approval of a disclosure statement. However, this notice requirement can be shortened upon a showing of cause under Bankruptcy Rule 9006(c).

4. The Debtor requests that this Court set a hearing date on or before July 2, 2009 for approval of Debtor's Disclosure Statement. The Debtor also requests that the Court set a June 29, 2009 deadline for the filing of objections to approval of Disclosure Statement.

5. The Debtor anticipates that it will file its First Amended Disclosure Statement and First Amended Joint Plan of Reorganization ("Amended Plan") shortly. Therefore, the Debtor requests that any notice also serve as notice of the hearing Disclosure Statement, as amended.

6. Shortening notice and the deadlines are warranted because time is of the essence to obtain confirmation of the Debtor's Plan. Several parties have expressed serious interest in participating in the auction process contemplated by the Plan. In addition, a scheduled insurance payment in excess of \$400,000 is due on or before August 1, 2009. The Debtor's estate is expected to deteriorate with delay and confirmation in July is beneficial to all parties involved. If the confirmation process is

extended into August, the estate stands to lose a substantial amount of cash that could be paid by a Buyer under the Plan.

7. In order to give parties the required 25-day notice of time to object to and vote on the Plan and have a confirmation hearing in July, the Disclosure Statement needs to be approved and served with the Plan before the July 4th holiday weekend.

8. No party-in-interest will be prejudiced by the relief requested in this Motion and cause exists to grant same. All the major parties in this case are well represented and have consented to this timetable. Furthermore, the Debtor's Disclosure Statement was filed and served on May 15, 2009, over a month ago. The only major changes expected in the First Amended Disclosure Statement to be filed are the incorporation of the terms of the bid procedure and the agreement between the Creditor's Committee and TAG for the distribution of proceeds. With the agreement of the parties described above, the Debtor does not expect the hearing to be contested or take more than 10-15 minutes.

WHEREFORE, the Debtor requests that this Court (i) shorten the notice deadlines in Bankruptcy Rule 2002(b); (ii) set a deadline for objections to approval of the Disclosure Statement, as amended, for June 29, 2009; (iii) set a hearing date of July 2, 2009 for Approval of Debtor's Disclosure Statement, as amended; and (iv) grant such other and further relief to which the Debtor may be justly entitled.

Respectfully submitted,

/s/ Duane J. Brescia

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Bankruptcy Attorneys for the Debtor

CERTIFICATE OF CONFERENCE

The undersigned certifies that this motion is unopposed by the Thielert AG (the principal of the Debtor and unsecured creditors), the Creditors' Committee and the U.S. Trustee.

/s/ Duane J. Brescia

Duane J. Brescia

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document was served upon the parties listed below, if any, and on the attached service list via First Class U.S. Mail, postage prepaid and email on June 17, 2009.

/s/ Duane J. Brescia

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